

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

KEITH EUGENE WATERS,

Plaintiff,

v.

HIRERIGHT, LLC,

Defendant.

Civil Action No. 4:23-cv-06668-SAL

**DEFENDANT HIRERIGHT, LLC'S MOTION FOR LEAVE TO FILE DOCUMENTS**  
**UNDER SEAL**

Pursuant to Fed. R. Civ. P. 5.2 and Local Rule 5.03, Defendant HireRight, LLC ("HireRight") hereby respectfully moves the Court for leave to file under seal Exhibits 7, 8, 9, 10, 11, 15, and 16 to its Motion for Summary Judgment and related discussion in the Motion for Summary Judgment. Pursuant to Local Rule 5.03(A), HireRight has filed herewith a memorandum in support of its motion to seal, a non-confidential descriptive index of documents, which is attached hereto as **Exhibit A**, and the undersigned counsel's certificate of compliance with this rule, which is attached hereto.

**COUNSEL'S CERTIFICATION**

The undersigned counsel for HireRight, LLC certifies that, prior to filing this Motion, counsel contacted counsel for the plaintiff in order to consult regarding the Motion and counsel for Plaintiff has indicated stated he is unsure whether he will object to this Motion and will not decide until after it is filed. Counsel for the Defendant further certifies that it complied with the provisions of Local Civil Rule 5.03 with regard to the filing of this Motion. Defendant is submitting the identified documents directly to chambers for *in camera* review in accordance with Local Civil Rule 5.03(C).

Respectfully submitted,

**HAYNSWORTH SINKLER BOYD, P.A.**

s/ Wm. Howell Morrison

Wm. Howell Morrison (Fed ID# 8406)

134 Meeting Street, 3rd Floor

Charleston, SC 29401

(843) 720-4405 Telephone

[hmorrison@hsblawfirm.com](mailto:hmorrison@hsblawfirm.com)

Leah A. Tedford (*pro hac vice*)

Andrew Notaristefano (*pro hac vice*)

Layal Issa Ramirez (*pro hac vice*)

**MONTGOMERY MCCracken Walker &  
Rhoads LLB**

1735 Market Street, 20th Floor

Philadelphia, PA 19103

(215) 772-7401 Telephone

(215) 772-7620 Facsimile

[ltedford@mmwr.com](mailto:ltedford@mmwr.com)

[anotaristefano@mmwr.com](mailto:anotaristefano@mmwr.com)

[lr Ramirez@mmwr.com](mailto:lr Ramirez@mmwr.com)

Dated: June 27, 2025

*Attorneys for Defendant HireRight, LLC*